

The Role of Language in Higher Education Institutions' Quality Assurance Processes



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Summary

The Swedish higher education sector is distinguished by a high level of internationalisation. One expression of this is the presence of international students, doctoral students and staff at Swedish universities and university colleges. Another is the widespread use of the English language in the research and education conducted at Swedish higher education institutions (HEIs). How internationalisation affects HEIs' quality assurance processes has been the subject of one of the thematic evaluations conducted by the Swedish Higher Education Authority (UKÄ).

This report deals with the participation of international students, doctoral students and staff in HEIs' quality assurance processes. The report reveals that choice of language – in practice, a choice between Swedish and English – in various activities and organisational units impacts the ability of these groups to influence their education and contribute to the administrative, strategic and quality assurance work conducted at their HEI.

The report is divided into three parts. Part one describes the legal framework regulating internationalisation and language use in the operations of HEIs, specifically the Higher Education Act (SFS 1992:1434) and the Language Act (SFS 2009:600), as well as the Standards and Guidelines on which UKÄ's reviews and evaluations are based. One key requirement of this regulatory framework is that students, doctoral students and staff must be involved in quality assurance processes. This report gives an account of the goal conflicts arising from the regulations and some of their potential consequences.

Part two presents the results of a survey of expert opinions from UKÄ's institutional reviews and evaluations of third-cycle programmes. The purpose of the survey is to explore the extent and nature of language-related obstacles to participation, as well as the recommendations and proposed solutions. The survey covers the period 2017–2022.

The survey reveals that, according to UKÄ's assessment panels, language-related obstacles to participation are relatively common at Swedish HEIs despite that fact that the majority of these have an established language policy or other document that regulates language use. One example is the lack of translated material, something that threatens to prevent international students, doctoral students and academic staff from familiarising themselves with quality assurance processes and affects the administrative context in which quality assurance takes place. The survey also calls attention to the different teaching opportunities available to doctoral students depending on which

language they have access to. Assessment panels also comment on the difficulties international groups face in participating in the administrative groups and bodies that conduct quality assurance work and, in many cases, they take a positive view of the use of English within all organisational units at HEI's, or recommend greater use of English. Whether such opinions are a call to implement parallel language use is impossible to discern.

Part three supplements the survey with an international overview of language use and language policy at HEIs in the comparable countries Norway, Finland and Denmark, and in France. While the Nordic countries have education systems that are largely similar to Sweden's, France is used as something of an illuminating counterexample. The similarity of the systems notwithstanding, the overview reveals distinct variations in regulation and practice concerning language use in higher education.

In light of the described regulatory framework, the survey and the external analysis, the report presents a few general reflections:

- While opinions concerning the participation of international groups are expressed, the comments do not address a specific assessment criterion in any of UKÄ's reviews and evaluations. Nor does the existing quality assurance system include assessment criteria that directly address language use. There is therefore a risk that the participation of international students, doctoral students and staff in quality assurance processes has been unevenly reviewed and will continue to be weighted differently in individual assessments. As such, there may be reason to strengthen this element in the assessor training provided by UKÄ prior to reviews.
- The Nordic countries have a longstanding ambition to adopt a common language policy. Despite this, there are discrepancies in terms of language choice and management within higher education and research. While Finland and Norway both have higher education and language acts that regulate HEIs, Denmark has more decentralised and voluntary regulation.

One difference relates to the specific consideration given to the operations of HEIs in legislation. Norway and Finland have higher education acts that regulate the language of administration in universities and university colleges. Norway's language act is more far-reaching than the other countries in that it also covers academic language.

Another difference is found in the expectations placed on staff, students and doctoral students recruited from abroad to acquire each country's language, and the language support offered to help them meet these expectations.

The extent to which internationally recruited staff and students are able to participate in quality assurance processes does not seem to be such a prominent issue in the other countries as it is in Sweden.

- The Swedish Language Act is a framework law for public authorities that takes no account of the specific assignments and operations of HEIs. There are obvious signs that it may conflict with the Higher Education Act with regard to its practical application at universities and university colleges. The Parliamentary Ombudsmen have addressed such conflicts and pointed out contradictions on several occasions in an attempt to clarify the situation. However, the opinions of assessment panels on language management at HEIs demonstrate that the problem persists and that it threatens to make it more difficult for HEIs to involve international students, doctoral students and staff. There is also a risk that it will hinder the acquisition of qualifications and block career paths.

It is clear that the English language is continuing to expand into research and education at Swedish HEIs, hence the need to follow up the extent to which the Language Act supports HEIs' specific responsibility as government agencies to ensure that, in research and education, "Swedish terminology in their various areas of expertise is accessible, and that it is used and developed". This is emphasised as an important motivation in the government bill introducing the Language Act.

This is a report on one of UKÄ's thematic evaluations. While the central question has been how language use relates to quality assurance processes, the evaluation has also touched on subjects such as the attractiveness of Swedish HEIs, their strategic recruitment and skills provision, as well as the work environment in the sector. Hopefully the report and the results it presents can also be used as a basis for discussion on these subjects.

Thematic evaluation is a specific form of reporting based on analysing existing material to enhance knowledge and provide documentation as an aid to quality assurance in the higher education sector. Thematic analysis is part of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). UKÄ applies ESG to its quality assurance of Swedish higher education. ESG 3.4 states that agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Introduction

Method and implementation

The Swedish Higher Education Act (SFS 1992:1434) states that quality assurance procedures are the shared concern of staff and students at higher education institutions. It also states that the international activities of each higher education institution must enhance the quality of its research and education. More often than not, international activities involve the use of a language other than Swedish – in the vast majority of cases, English. Meanwhile, most Swedish HEIs are government agencies subject to the Language Act, which prescribes that Swedish is the language of the public sector, and that government agencies have a specific responsibility for ensuring that Swedish is used and developed in their various areas of expertise.

As prescribed in the Higher Education Act, in UKÄ's reviews the influence of students and doctoral students is viewed as a key component of an HEI's quality assurance system. Over the years, many of the authority's reviews have actualised the issue of language use at HEIs and how this affects the ability of students and doctoral students to exert influence. In light of this, UKÄ has conducted a thematic evaluation of language management and quality assurance processes at Swedish HEIs with regard to the participation of international students, doctoral students and staff.

To avoid placing an additional administrative burden on HEIs, no new documentation was requested from them. The evaluation consists of three parts:

- A description of the regulatory framework governing quality assurance at Swedish HEIs, particularly the Higher Education Act and Language Act.
- A survey of expert opinions from UKÄ's reviews and evaluations related to the opportunities for international students, doctoral students and staff to participate in quality assurance processes.
- An account of how the issue of language use and participation manifests and is dealt with in higher education and research in comparable countries.

The survey is limited to the period 2017–2022. The assessment criteria for reviews have been changed since then. A list of the relevant assessment criteria during the period in question is included as an appendix to the report.

The survey covers 42 institutional reviews, 138 evaluations of third-cycle programmes and 2 thematic evaluations based on mentions of language barriers and opportunities to participate in quality assurance processes.

In examining the extensive textual material generated by the reviews and evaluations, a number of keywords have been used to capture comments and opinions on the participation of international groups: for example, “English”, “Swedish”, “International” and “language”. Follow-ups of institutional reviews (including reports on measures taken) and decisions in programme evaluations have also been examined to determine whether criticism of and opinions on language issues and participation highlighted in the original opinions influenced the final judgement, or if the HEI in question addressed the language-related comments and recommendations.

As the purpose of the survey has not been to highlight individual HEIs as either particularly problematic or good examples, no universities or university colleges are named in the report. However, some HEIs are mentioned by name in the limited review of language policies at HEIs that is also reported by the project group.

The thematic evaluation also looks further afield to our Nordic neighbours Norway, Denmark and Finland, all of which have similar education systems to Sweden thus justifying a comparison of the legal framework and language management at HEIs. These perspectives illuminate an issue that, as demonstrated by the survey, is at the same time prominent and to some extent hidden in quality assurance processes. To supplement the analysis with a somewhat different case, France is also included in the overview.

The external overview uses the same type of material as the Swedish survey, if slightly less systematically, and includes descriptions of corresponding language acts, higher education acts, language policies, reports and expert opinions from institutional reviews. The selection of HEIs is designed to provide a broad range of experiences and practices. Information has been obtained from UKÄ’s sister organisations in each country. The purpose of the chapter is not to paint a detailed picture of the situation in each country but rather to reveal thought-provoking differences and similarities.

Internationalisation and national language policy

Internationalisation is apparent in mobility and the spread of English

Internationalisation has often been defined as:

“the intentional process of integrating an international, intercultural or global dimension into the purpose, functions and delivery of post-secondary education, in order to enhance the quality of education and research for all students and staff, and to make a meaningful contribution to society”.¹

Internationalisation has been explicitly linked to quality assurance in the Higher Education Act since 2021, when the third paragraph of Section 5 of Chapter 1 of the Act was amended from the general instruction to HEIs “to promote understanding of other countries and international conditions” to the broader remit that “the collected international activities of each higher education institution must enhance the quality of its research and education”.

Section 4 of Chapter 1 of the Higher Education Act states that “quality assurance procedures are the shared concern of staff and students at higher education institutions”, while Section 4a instructs HEIs to “endeavour to enable students to play an active role in the continued development of courses and study programmes”.

Internationalisation has made its mark in Swedish higher education and research in various ways. One is the international mobility of students, doctoral students and staff. In 2024, around a quarter of staff in the category researchers and teaching staff had only foreign qualifications.² In the academic year 2024/25, there were just under 47,000 incoming students to Swedish HEIs, corresponding to almost 12 per cent of the total number of students.³ In 2024, foreign doctoral students accounted for just under 40 per cent of all doctoral students, with significant differences in terms of distribution between subject areas.⁴

Both the number and percentage of international students and academic staff have increased over recent years. With the exception of 2010/11, when tuition fees were introduced for third-country students, and during the pandemic, the increase in incoming students has been continuous and

¹ de Wit, et al., 2015, cited in Swedish Government Official Report SOU 2018:3 p. 65.

² UKÄ, Increasing numbers of internationally recruited researchers, retrieved 20.02.2026.

³ Statistics Sweden, Education and Research in the Higher Education Sector: International student mobility in higher education 2024/25, 27.11.2025.

⁴ Statistics Sweden, Education and Research in the Higher Education Sector: Postgraduate students and degrees at third cycle 2024, p. 23.

long term. Similarly, the percentage of international academic staff increased by around 10 per cent in barely a decade, from 16 per cent in 2014 to 25 per cent in 2024.⁵

Another expression of internationalisation is the increasingly widespread use of the English language in research and education at Swedish HEIs. English has long dominated scholarly publication, but recent decades have also seen a significant increase in its use in teaching. When the Language Council of Sweden commissioned a survey of Swedish HEIs in 2010, it revealed that 87 per cent of all theses were written in English. Although there was variation between subject areas, the survey demonstrated that the advance of English had been going on for decades.⁶

The figures were similar in a survey conducted by UKÄ in 2016:⁷ 85 per cent of doctoral theses were written in English and the variation between subject areas persisted, with 91 per cent of theses in engineering, medicine and health sciences written in English compared to 55 per cent in the humanities.⁸

A broader Swedish study of scholarly publications and language of instruction published in 2022 revealed that English had become even more prevalent in academia over recent years. At the time of publication, just over 90 per cent of theses and articles were written in English and the authors of the report noted a significant increase in domains such as the social sciences and humanities.⁹ English was also becoming more common as the language of instruction, being used in over 60 per cent of second-cycle courses at the HEIs studied. Moreover, almost a quarter of courses taught in Swedish had no compulsory course literature in Swedish.¹⁰

The forces driving internationalisation are many and they change over time and from one stakeholder to the next. The individual researcher's desire to achieve a higher level of academic quality, the HEI's desire to raise its profile, a nation's ambition to increase economic growth or promote cultural exchanges, all of these are motives for internationalisation.¹¹ With the development of comprehensive internationalisation as a strategic, coordinated process over recent years, these motives now largely coincide; the international perspective

⁵ UKÄ Annual Report 2025, p. 141.

⁶ Salö 2010, p. 21 ff.

⁷ The surveys used different methods: the Language Council of Sweden retrieved data from the Libris database, while UKÄ circulated a questionnaire to doctoral students.

UKÄ, *The Doctoral Student Mirror: A Survey of Doctoral Students' Opinions About Their Studies* (2016:18), p. 58.

⁹ Malmström and Pecorari, *Language choice and internationalisation: The roles of Swedish and English in research and higher education*, pp. 32–38.

¹⁰ *Ibid.*, pp. 20–21.

¹¹ SOU 2018:3, p. 70.

permeates HEIs' organisations and becomes a means to achieve strategic goals.¹²

In a European context, the European Commission's European Universities initiative is an important engine for increased, integrated internationalisation. At the time of writing, there are 65 European Universities alliances involving almost 570 higher education institutions committed to promoting mobility and exchanges between HEIs in different countries, improving the international competitiveness of higher education institutions in Europe, supporting growth and promoting European values and identity.¹³

Internationalisation need not mean that the English language will gain even more ground. Ongoing work by the European Commission and Member States to create a joint European degree – which will be rolled out as a label for joint degree programmes – promotes multilingualism as a core feature of the “European dimension” of degree labelling. To qualify for the label, joint degree programmes must equip each student with language skills through exposure to at least two different EU languages during learning activities or mobility.¹⁴

The Language Act governs public authorities' language use

Swedish public authorities are subject to the Language Act (SFS 2009:600), the purpose of which is to secure the position of the Swedish language in Swedish society. The Act is based on the government bill *Language for All: Proposal for a Language Act (2008/09:153)*. According to the bill, increasing internationalisation in many areas of society threatens to impoverish the national language as professional occupations are conducted in a language other than the professional's mother tongue. The bill also states that access to information in a common language is ultimately a democratic issue, as all citizens must be able to participate in the public discourse.¹⁵

Sections 4–6 of the Language Act state that Swedish is the principal language in Sweden, that it is the common language that all residents of Sweden are to have access to and be able to use in all areas of society, and that the public sector has a particular responsibility for its use and development. Sections 10–12 of the Act state that Swedish is the administrative language in the public sector, and that government agencies have a specific responsibility to ensure that Swedish

¹² Swedish Foundation for International Cooperation in Research and Higher Education (2014:2), p. 13; SOU 2018:3, p. 68.

¹³ See, for example, Council conclusions on the European Universities initiative (2021/C 221/03); European Commission 2025.

¹⁴ Council Recommendation of 12 May 2025 (C/2025/3006).

¹⁵ Government Bill 2008/09:76, pp. 7–8.

terminology in their various areas of expertise is accessible, and that it is used and developed.¹⁶

As HEIs are administrative authorities, they are subject to the Language Act. The use of the Swedish language is therefore compulsory in the core areas covered by the Act, such as decision-making, regulations, annual reports and documents of a similar nature. While as a general rule Swedish should also be used outside these core areas, an HEI may make an exception based on balance of interests. Any deviation from the provisions of the Language Act must be justified on objective grounds. However, the Language Act does not prevent HEIs from conducting teaching and research in languages other than Swedish.¹⁷

The risk of internationalisation efforts conflicting with the Language Act has been highlighted on numerous occasions. In *Language for All: Proposal for a Language Act*, the Government noted that it was considering amendments to the Higher Education Ordinance to clarify opportunities to use languages other than Swedish in research and higher education. No such amendments were implemented. In light of this, the Commission of Inquiry on the Increased Internationalisation of Higher Education proposed a wider exemption from the Language Act for HEIs and research financiers that would cover some administrative tasks, as “the use of Swedish in formal policymaking contexts excludes many staff and students from participating in the development of the higher education institution”.¹⁸

Similarly, researchers in the field have described how reforms related to internationalisation and language use have forced HEIs to manage conflicting goals:

“On the one hand, internationalization required a presence on a global market where they were assumed to compete for resources: employees and students. In order to make that possible they needed to adopt English as their primary language. On the other hand, exercising public authority required them to give Swedish primacy.”¹⁹

While the requirement for Swedish as the administrative language is deemed to make it more difficult for students, doctoral students and staff with inadequate knowledge of Swedish to participate in the development of HEIs, the widespread use of English on the other hand does not appear to be an obstacle to the Language Act’s requirement for the public sector to use and develop Swedish.

¹⁶ Language Act (SFS 2009:600).

¹⁷ Government Bill 2008/09: 153, p. 20; cf. Parliamentary Ombudsmen 2010/11, p. 642.

¹⁸ SOU 2018:3, p. 156.

¹⁹ Karlsson, and Karlsson, *Higher Education Marketization: A Case of Language and Colliding Interests*, p. 74.

The dominant position of English in higher education and research does pose a potential obstacle to HEIs' fulfilling their mandate pursuant to Section 2 of Chapter 1 of the Higher Education Act, which includes: "collaboration for mutual exchanges with the surrounding community, as well as ensuring that the knowledge and expertise found at the higher education institution bring benefit to society".²⁰ In an anthology published by the Expert Group on Public Economics (ESO), Forslund and Henrekson contend that the collaboration mandate requires "in-depth knowledge of Swedish conditions" and that "if one does not master one's field in Swedish, to a large extent one will not have opportunities to collaborate".²¹ This assessment applies to both Swedish-speaking researchers who choose not to publish internationally in their native language and to those who have no access to the Swedish language.

There is no clear demarcation between the use of English and Swedish in the activities of HEIs. Hence the need for clarification in specific situations. In the report *Fair Examination* [Rättssäker examination], UKÄ describes certain specific situations. For example: "The grading decision and other decisions made by an HEI regarding a student's grade must always be written in Swedish. Furthermore, a student is to always have the option of communicating with the HEI about the grade in Swedish. With regard to the examination language, the primary rule is that students should be able to use Swedish. However, students must submit responses in a language other than Swedish if the course objectives require it, and otherwise risk failing the test".²²

The Parliamentary Ombudsmen have made statements on language application in higher education and research on three occasions. One case in 2009 involved a research financier's requirement for grant applications to be submitted in English. In his decision, the Parliamentary Ombudsman states that Swedish must always be used within the core areas of public sector activities. The Parliamentary Ombudsman does however acknowledge that the government bill preceding the Language Act played down the conflict between internationalisation and the Language Act: "In the bill, it is claimed that there is no conflict between internationalisation and the safeguarding of Swedish as the primary language. In my opinion, however, research and education are an obvious example of one area in which such a conflict exists," he wrote.²³

In another case from 2011, an HEI required applications for employment and promotion to be written in English. In her decision, the Parliamentary Ombudsman stated that appointments and promotions involve the exercise of public authority over private persons and that

²⁰ Swedish Higher Education Act (SFS 1992:1434)

²¹ Forslund and Henrekson, "Swedish is a tool – not an obstacle" in *For the Public Good? An ESO Anthology on the Conditions for Research and Collaboration* (2024:2), pp. 138–139.

²² UKÄ, *Fair Examination*, p. 44. See also pp. 41–45.

²³ Parliamentary Ombudsmen 27.10.2009, Decision No. 1811-2008, p. 7.

Swedish must be used for processing and decision-making.²⁴ That said, the Parliamentary Ombudsman noted that there appears to be no obstacle to, for example, obtaining expert assessments of applicants' skills in English if deemed necessary. She also expressed understanding that the "increasing internationalisation taking place in Swedish higher education" was increasing expectations on applicants to write their application in English. The Parliamentary Ombudsman also noted that, in its bill introducing the Language Act, the Government noted that it was considering amendments to the Higher Education Ordinance to clarify opportunities to use languages other than Swedish in research and higher education, and therefore found reason to send copies of her decision to the Government Offices of Sweden and the Ministry of Education and Culture for information purposes.²⁵

The third case, from 2026, deals with whether HEIs for which the Government is the accountable authority can require students to complete an assignment for assessment in English.²⁶ In his decision, the Chief Parliamentary Ombudsman notes that assessment involves a grading decision and thus the exercise of public authority over the student. The scope for refusing to allow the student to complete the assignment in Swedish is therefore limited. Furthermore, the Chief Parliamentary Ombudsman states that students may be denied the use of Swedish if this is necessary in order to assess whether the student has achieved the intended learning outcomes stated in the course syllabus. So, the use of Swedish may be denied if this is necessary for practical reasons in the case in question, but the HEI also has a far-reaching obligation to offer alternative solutions that permit the use of Swedish. In this case too, the Chief Parliamentary Ombudsman concludes by reiterating the need for legal guidance on the matter of language use in higher education and research and urges the Government to review applicable legislation.

Like the Parliamentary Ombudsmen, a number of bodies consulted in the procedure prior to the passing of the Language Act underlined the necessity of considering the specific conditions prevailing in higher education and research.²⁷ As yet, no amendments have been made to the Higher Education Ordinance to clarify the use of languages other than Swedish in research and education. Consequently, there are no exceptions to the requirements of the Language Act for HEIs.

²⁴ Swedish National Agency for Higher Education, *The Language Act and the Activities of Higher Education Institutions*, p. 6.

²⁵ Parliamentary Ombudsmen, 31.08.2011, Decision No.1098-2010, p. 10.

²⁶ Parliamentary Ombudsmen, 03.02.2026, Decision No.1742-2025.

²⁷ Government Bill 2008/09: 153, p. 20; cf. SOU 2018: 3, p. 156.

Choice of language and quality assurance

Many HEI's advocate parallel language use

Language policies or other documents on language choice are tools for HEIs to manage the legal framework around language and internationalisation. In its 2008 report *En högskola i världen – internationalisering för kvalitet* [A University in the World: Internationalisation for Quality], the former Swedish National Agency for Higher Education described the prevalence of language policies at Swedish universities and university colleges, and recommended that HEIs develop local language policies in response to ongoing internationalisation.²⁸ Similar recommendations were made in the interim report of the Commission of Inquiry on the Increased Internationalisation of Higher Education, *A Strategic Agenda for Internationalisation*.²⁹

The Language Council of Sweden has commissioned surveys of language use at Swedish HEIs on multiple occasions, including on the prevalence and design of language choice documents. In a study conducted in 2010, Linus Salö found that nine HEIs had established such documents, mainly dealing with the language of research and teaching. One prominent characteristic of language practice at the HEIs was that English was mostly used in second-cycle courses and programmes. Salö observed that compliance with language policy was somewhat patchy, including with regard to Swedish summaries in English-language doctoral theses. Although these increased over time at the surveyed HEIs, he noted that “the introduction of a language document requiring summaries in Swedish has had no impact on the actual increase”.³⁰

The Language Council of Sweden published a follow-up study in 2017. By the time this survey was conducted (2016), 21 of 47 HEIs had established a language choice document. Another five HEIs stated that they were preparing guidelines on language use. According to the author of the study, Susanna Karlsson, language choice documents are an attempt to establish local approaches and guidelines based on national law and, at the same time, an expression of HEIs as “language policy actors”.³¹

Differences in design and point of departure notwithstanding, the report's author sees a number of thematic similarities between the

²⁸ Swedish National Agency for Higher Education, *En högskola i världen – internationalisering för kvalitet*, 2008, pp. 34–37.

²⁹ SOU 2018:3, p. 155.

³⁰ Salö, *Engelska eller svenska? En kartläggning av språksituationen inom högre utbildning och forskning*, 2010, p. 48.

³¹ Karlsson, *Språkpolitik vid svenska universitet och högskolor*, 2017, p. 10.

documents, one being that “administration” is addressed to a much greater extent than during earlier surveys. She sees this as an important addition as, “unlike teaching and research, there is less ambiguity concerning whether administrative activities constitute public administration and are thus subject to the Administrative Procedure Act and Language Act”.³²

In her summary, Karlsson describes the goal conflict that can arise at an HEI when it tries to reconcile internationalisation and the Language Act:

“To be able to participate fully in the work of Swedish universities and university colleges, it requires not only that one participates in research and teaching, but also in administration and management. In its choice of administrative language, the Language Act Bill does not allow the same leeway as it does for teaching and research. The language of administration is Swedish. As a result, internationally recruited staff members are not always able to participate fully in management activities, which may affect their ability to contribute to the management and development of the workplace. This in turn may block qualification and career paths.”³³

So, there is a risk that international staff will be excluded from leadership and management roles and thus have less opportunity to exert influence, acquire qualifications and carve out a career. The converse risk is also true: the few who speak and understand Swedish will be much more likely to be burdened with administrative tasks. As many reports have demonstrated, administration constitutes a large part of an HEIs activities that is occasionally viewed as a hinderance to the core operations of teaching and research, and to acquiring academic qualifications.³⁴

Language choice documents at several HEIs advocate parallel language use as a means of conducting operations at a multilingual institution. Parallel language use means that multiple languages are used side by side within an organisation without detriment to any of the languages.³⁵ According to the Language Council of Sweden’s 2017 survey, roughly half of HEIs’ language choice documents describe parallel language use – or similar terms such as *multilingualism* and *linguistic diversity* – as desirable.³⁶

³² Ibid. p. 37.

³³ Karlsson, *Språkpolitik vid svenska universitet och högskolor*, p. 37.

³⁴ See, for example, UKÄ, *Utvärderingars inverkan på den administrativa bördan i högskolesektorn*, pp. 16–18; cf. Ahlbäck Öberg and Boberg, *Ökad kontroll och ökad byråkratisering*.

³⁵ See, for example, Gregersen et al., *More parallel, please! Best practice of parallel language use at Nordic Universities*, p. 9.

³⁶ Karlsson, *Språkpolitik vid svenska universitet och högskolor*, pp. 25–26.

UKÄ's review of a number of HEIs' language policies reveals that it is mainly if not exclusively the larger universities that embrace parallel language use, which is associated with values such as attractiveness and collaboration as well as encouraging participation in the full breadth of the HEI's operations. For example, Uppsala University describes parallel language use as one of the overall objectives of its language policy, alongside linguistic awareness, multilingualism and plain language.³⁷ Stockholm university "strives for the parallel use of Swedish and English in order to be an attractive workplace for both national and international staff and students".³⁸ Lund University's language policy advocates parallel language use "to enable students and employees to function well at the University and in society, regardless of whether or not they master Swedish", while Karolinska Institutet states that "parallel lingualism is essential to enabling students and staff to engage in dialogue and interact with others"³⁹. The University of Skövde states that the goal of parallel language use is to reconcile the internationalisation of research and education with the work of developing Swedish terminology and Swedish textual patterns within each subject area and operational area".⁴⁰

³⁷ Language Policy for Uppsala University, 2016.

³⁸ Stockholm University's Language Policy, 25.03.2021

³⁹ Lund University Language Policy, 19.06.2014; Karolinska Institutet's Language Policy, 20.02.2024

⁴⁰ University of Skövde's Language Policy, 04.16.2018.

The participation of international students, doctoral students and staff in HEIs' quality assurance processes

Language choice features in UKÄ's reviews and evaluations

UKÄ's quality assurance system consists of four components: institutional reviews of HEIs quality assurance processes; programme evaluations to monitor the outcome of programmes and contribute to the HEI's own quality enhancements; appraisal of applications for degree-awarding powers, to assess whether the conditions exist at an HEI for students to achieve the qualitative targets for a given qualification; and thematic evaluations, which are not associated with any sanction. Between 2017 and 2022, none of the components of the quality assurance system included assessment criteria that explicitly addressed language choice. The same is true of the present system. Issues related to the language of education, research and administration are usually addressed by assessment panels under assessment criteria related to student influence, career support, communication, the doctoral students' perspective and the study environment.

The involvement of students, doctoral students and staff in administrative and management activities is a key component of HEIs' quality assurance processes. This is made clear in the Higher Education Act and the European Standards Guidelines (ESG) on which UKÄ's assessment criteria are based. Pursuant to Section 4 of Chapter 1 of the Higher Education Act "quality assurance procedures are the shared concern of staff and students at higher education institutions", while Section 4a instructs HEIs to "endeavour to enable students to play an active role in the continued development of courses and study programmes". ESG places requirements on HEIs to design, review and evaluate their programmes in dialogue with all groups of students.⁴¹

The review of expert opinions shows that the consequences of language choice for quality assurance and development are mentioned relatively

⁴¹ For example, standards 1.2, 1.6 and 1.9. Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015, pp. 11, 14, 15. Standards and relevant assessment criteria for UKÄ's reviews can be found in Appendix 1 to this report.

often. Assessment panels commented on language use in relation to student and staff participation in quality assurance processes in over half (25 of 42) of institutional reviews and almost one third (43 of 138) of evaluations of third-cycle programmes. The issue of language is not mentioned in either of the thematic evaluations (widening access and collaboration) conducted during the period.

Assessment panels' opinions contain both good examples and criticism of varying degrees. All in all, they can be sorted into four major, partly overlapping themes.

1. Translation and communication

Several assessment panels comment on the extent to which HEIs translate documents and webpages and communicate the information contained therein within the organisation. Assessors working on both institutional reviews and programme evaluations have called attention to shortcomings in how information is shared with non-Swedish-speaking groups. According to the assessors, this makes it more difficult for these groups to not only keep informed but also to fully participate in the HEI's operations. One assessment panel writes that while the HEI has shown "awareness of the importance of offering international students, teachers and researchers information in English", despite this ambition "there are environments in which international representatives experience significant problems".

Another assessment panel noted that there were "communication issues with regard to foreign doctoral students in particular" at the HEI, and that "there are many different perceptions concerning the adequacy of the communication". In light of this problem, the panel recommended the HEI to continue developing "towards the increased use of English in communication [...] particularly with consideration for the HEI's efforts to function as an international research university".

The assessment panel in one institutional review pointed out that "not all important information is available in English, something that was also confirmed by representatives of teaching staff during the site visit". To address this deficiency, the HEI was urged to prepare "clear procedures for translating relevant information and governance documents", and to ensure that "information on the website and easily accessible information for the public is available in English".

Another assessment panel noted that it was not "apparent [...] from the documentation how the HEI supports equal conditions for [international students and doctoral students] compared to others". According to the assessors, the site visit revealed "shortcomings in which material is made available in English to both these student groups".

In evaluations of third-cycle programmes, several assessment panels comment on the use of individual study plans to document expectations and follow up the study routes of international doctoral students. For example, in one evaluation the assessment panel notes that “the evaluation [demonstrates] that ISPs are often not fully utilised or are sometimes ignored”. In contrast, a couple of assessment panels praise the HEI for translating the documents. One panel writes that “one positive is that the individual study plan is also available in English, including the intended learning outcomes”. Another notes that “the subject area [...] has also ensured that instructions and study plans are available in English, making things easier for non-Swedish-speaking doctoral students. The assessment panel considers this to be important.”

2. Support in Swedish and English

Several opinions address HEIs’ efforts to support language learning and strengthen the language skills of students, doctoral students and staff. The majority of these comments relate to opportunities for these groups to learn or develop their knowledge of Swedish, although there are also views on language support in English. The opinions are predominantly positive, emphasising the support offered by the HEIs for language development at either central or faculty level.

In the review of one HEI, the assessment panel highlights what it considers to be a good example of continuing professional development and integration: “newly recruited teachers without a good command of the Swedish language can also attend a course in Swedish”. Another assessment panel describes how “potential language barriers at the HEI are prevented by offering courses in Swedish”. The panel takes a positive view of “the mentor programme for newly recruited doctoral students established to integrate the doctoral students into the third-cycle study environment”.

One opinion describes it as a strength that “the faculty [...] has now attempted to ensure that information is disseminated in English, and has arranged a Swedish-language course at a time and place that suits doctoral students”. Another opinion highlights a strength in that “the HEI systematically offers language courses to non-Swedish-speaking doctoral students”.

Negative assessments relate mainly to the lack of language support. Although these opinions largely address interventions for those who do not speak Swedish, in a few cases they also mention training in English as a working and research language for Swedes. One assessment panel describes it as “remarkable that doctoral students with a foreign background are not offered courses in the Swedish language. This would be likely to further facilitate employment on the Swedish labour market.” Another assessment panel was of the opinion that Swedish doctoral students at the HEI in question benefit from “socialising with foreign

doctoral students on a daily basis with English the common language”, but at the same time criticised the lack of systematic English-language support for the Swedish-speaking group. “There is no mention in the self-evaluation,” they write, “of how doctoral students are trained to master English as a research language. This ought to be particularly important given that few doctoral students in the specialisation in question come from abroad, and that English is perhaps not the lingua franca of the laboratory.”

3. Teaching opportunities

Opportunities to teach, and experience of having taught, are a vital part of doctoral studies. Some evaluations of third-cycle programmes touch on the differing opportunities to teach afforded to Swedish-speaking and non-Swedish-speaking doctoral students respectively. According to the assessors, this creates problems in terms of equivalence and links between the programme and the world of work. One assessment panel, for example, criticises an HEI at which access to “the Swedish language determines the extent to which [doctoral students] can teach”. In summary, the assessors note that, this being the case, one “important area for improvement” at the HEI is to strengthen the conditions for “doctoral students who do not wish to or cannot teach to develop their ability to support other’s learning”. Another assessment panel recommends the HEI to “review” its programme with regard to the variation in teaching opportunities as it “appears [...] that English-speaking doctoral students and doctoral students on scholarships do not have the same opportunities to teach as others”.

In a third opinion, the assessment panel describes the current situation at the HEI as follows: “doctoral students [are offered opportunities] to teach in Swedish, meaning that doctoral students without a command of the Swedish language do not have the same opportunities to teach”. The assessors urge the HEI to increase opportunities to participate in teaching in order to strengthen the doctoral students’ links to working life.

Constructive ways to address variations in language skills are also commented on in the evaluations. For example, assessors in one third-cycle programme evaluation praise the allocation of teaching in the subject area based on the doctoral students’ language resources. “All doctoral students teach,” write the assessors, “with doctoral students who cannot speak Swedish acting as teaching assistants in second- and third-cycle programmes. Swedish-speaking doctoral students teach first-, second-, and third-cycle courses.”

4. Representation in administration and quality assurance

The inclusion, or lack thereof, of international students, doctoral students and staff in administrative activities and quality assurance processes

generated the most detailed comments. Several assessment panels directed criticism at HEIs whose quality assurance processes were mainly conducted in Swedish, on the grounds that this makes involving international students, doctoral students and staff more difficult. Particular criticism was reserved for the use of Swedish as the sole language of meetings. In several opinions, assessors demonstrate their awareness of the requirements of the Language Act. Although there is no explicit reference to parallel language use, it is referred to indirectly.

One assessment panel conducting an institutional review is of the opinion that “certain groups of doctoral students – such as externally employed doctoral students, international doctoral students and doctoral students from other HEIs – can find it difficult to get involved as there are no specific guidelines and procedures concerning how influence for these groups is to be organised”. Another assessment panel notes that “providing opportunities for international doctoral students to exert student influence – on drafting and decision-making bodies, for example – poses a particular challenge to the HEI”. A third feels that “one obstacle to doctoral students exerting influence is that the working language is Swedish [...]. As many doctoral students do not speak Swedish, their opportunities to participate on matters affecting their study situation are reduced.”

Many of the opinions contain positive judgements and examples. These too refer to the language of meetings in several cases. HEIs where English is used in administrative tasks to a large extent are encouraged by some assessors, who do not appear to see any risk that Swedish will be sidelined. On the contrary, the assessors view this language use as a strength, as it increases opportunities to involve non-Swedish-speakers in administrative roles and quality assurance. One assessment panel makes the following comment: “both nationally and internationally recruited third-cycle students receive adequate support in the programme and [...] all large meetings are held in English so as to include those who do not have command of the Swedish language”. Another assessment panel praises the HEI which, thanks to its “extensive use of English” provides “international students with good conditions for participating in quality assurance processes and getting involved in student representation”. This positive view of English as a meeting language is also expressed in comments such as: “meetings of the college of supervisors and monthly departmental meetings [are held] in English, as many doctoral students do not have Swedish as their mother tongue, something the assessment panel takes a positive view of”; and “meetings of both the Quality Council and Programme Council are [held] in English, something the assessment panel views as a good example of an opportunity for all doctoral students to participate in development activities”.

Several opinions refer explicitly to the Language Act. One of them urges the HEI to introduce English-language pre-meetings to facilitate the inclusion of international students. According to the assessment panel,

systematic pre-meetings “with student representatives and the chair of the body in question” would address the HEI’s “significant shortcomings” with regard to the participation of non-Swedish-speaking doctoral students in quality assurance processes. Another assessment panel states that the provision of the Language Act that Swedish is the language of the public sector “ought not to prevent the HEI from using other languages in meetings or applying other innovative solutions” to increase the participation of international groups in quality assurance processes.

One recurring viewpoint in evaluations of third-cycle programmes is that the “working language” constitutes either an obstacle to or encouragement of international doctoral students’ participation and influence. No explanation is given of what the assessment panel means by “working language” in this context. For example, it is not stated whether the term covers both education and research activities and administrative activities. One assessment panel takes a positive view of the use of English as a working language as “the present group of doctoral students is internationally diverse, being mainly recruited from abroad”. Another panel notes that “the doctoral student group is international. English, which is the supervisor’s native language, is also the doctoral students’ working language.”

Discussion

The survey of opinions shows that language choice, language management and the participation of international students, doctoral students and staff in quality assurance processes are relatively common subjects commented on by assessment panels in UKÄ’s reviews and evaluations during the period, and that these are topical issues at Swedish HEIs. The opinions touch on several aspects of operations at the HEIs and relate to a number of professional categories. That said, the comments primarily refer to students and doctoral students. While the opinions contain both criticism and proposals and recommendations, there are no requirements for follow-ups in the material surveyed.

It is difficult to discern any consistent patterns in institutional reviews and evaluations of third-cycle programmes from this fairly extensive material. For example, there are no obvious differences between large and small HEIs and both types are touched on in the assessment panels’ comments. In programme evaluations, the viewpoints expressed mainly relate to the larger and broader HEIs, and then primarily their science and engineering programmes, which are also the programmes that attract most foreign students and doctoral students. Nor is it possible to discern any significant changes over time, such as problems related to language choice and participation becoming more or less prevalent.

In part at least, the lack of categorical results is probably due to the fact that language management and use is not an assessment criterion in its

own right, nor is it an explicitly stated part of any assessment criteria in any of UKÄ's reviews and evaluations. Opinions and reflections are therefore found under assessment criteria such as student influence, career paths, communication, the doctoral student perspective and the study environment. Differences in the attention paid by assessment groups may also be due descriptions submitted by students, as well as the particular areas of interest of individual assessors or the participation of international students and doctoral students in interviews conducted at HEIs.

Despite this, it is clear that several assessment panels take a positive view of the use of English and in several cases recommend that its use be extended throughout the HEI's organisation in order to include international students, doctoral students and, logically, staff in administrative and quality assurance activities. It is difficult to discern whether these recommendations constitute encouragement to more overtly introduce or work towards parallel language use. Although the term *parallel language use* – as found in several HEIs' language choice documents – does not appear in any of the surveyed opinions, it does seem to be implicitly advocated. Meanwhile, references to the Language Act demonstrate that many assessment panels are aware of the statutory provisions regulating HEIs' language use.

In UKÄ's opinion, it is debatable whether certain views expressed by assessment panels are consistent with the Language Act. This concern primarily applies to the use of English as the meeting language in the administrative organisation. Certain types of meeting may fall within the core area of the Language Act, where the use of Swedish may be compulsory in all verbal exchanges. Thus far, UKÄ has not had cause to adopt a position on this in its supervisory activities.

Language policy: An international overview

Since 2002, the European Union (EU) has had the stated policy goal of “mother tongue plus 2”, i.e., that all citizens of the EU should be able to communicate in two languages in addition to their mother tongue.⁴² To support the attainment of this goal, the EU has adopted two indicators to measure and compare language skills.⁴³ A joint language policy has also been developed at Nordic level. In 2006, the Nordic Council of Ministers adopted the Declaration on Nordic Language Policy, one of the objectives of which is to ensure that “everyone living in the Nordic Region can speak, understand, read, and write the language(s) essential to society in the area where they live and are able to participate actively in society”.⁴⁴ The Declaration was revised in 2024⁴⁵ to emphasise national minority languages, so that everyone living in the region has the opportunity to “preserve and develop their mother tongue, indigenous, sign and national minority languages”.

To put the situation in Sweden into relief, this section provides an overview of national language policy in several Nordic countries and France. It also looks at how a selection of HEIs with varying profiles in these countries approach the regulatory framework and how this is expressed in their quality assurance processes.

Norway

The Norwegian Language Act entered into force in 2021 for the purpose of strengthening the Norwegian language in order to safeguard it as a complete language. As in Sweden, public bodies, including universities and university colleges, have a specific responsibility to use and develop the language.⁴⁶ Unlike Sweden, language is also regulated in the Norwegian Universities and University Colleges Act.⁴⁷ Section 2-3, “Norwegian and Sámi professional language”, states: that universities and university colleges shall use, develop and strengthen Norwegian professional language, both Bokmål and Nynorsk; that institutions that have been given special responsibility for Sámi research and higher

⁴² Commission of the European Communities, Com(2002) 72 p. 18.

⁴³ Commission of the European Communities, Com(2005) 356 pp. 5–7. The indicators can be found on the European Union official website Europass, Common European Framework of Reference for Language Skills.

⁴⁴ Declaration on Nordic Language Policy, 2007.

⁴⁵ Nordic Council of Ministers, Declaration on Nordic Language Policy, 2024.

⁴⁶ Act relating to Language (Language Act), LOV-2021-05-21-42.

⁴⁷ Act relating to universities and university colleges (Universities and University Colleges Act), LOV-2024-03-08-9.

education shall use, develop and strengthen Sámi professional language; and that the language of instruction shall be Norwegian or Sámi – although the Act permits institutions to grant exceptions when academically justified.⁴⁸ Section 2-3 also states that the Ministry may issue regulations on the institutions’ responsibilities under this section. Pursuant to Section 11-5, “Written language for examinations”, students may choose to receive examination question papers in either of the two official forms of written Norwegian (Bokmål or Nynorsk). The Ministry may issue regulations on written language for examinations, including exceptions to this section.

In the years since the Language Act was introduced, the issue of HEIs’ language use has remained on the political agenda and in the public discourse. In 2023, ongoing concern about the dominance of English at universities and university colleges prompted the Government to present an action plan to strengthen the development of Norwegian as an academic language.⁴⁹ The action plan notes that, despite the provision of the Universities and University Colleges Act that Norwegian shall be the main language of the country’s HEIs, English is spreading not only in teaching and research but also in administration and management. The action plan contains regulatory proposals to reinforce the position of Norwegian at HEIs, including introducing a requirement for knowledge of Norwegian equivalent to level B2⁵⁰.

Employee organisations and academic staff have argued that the new language requirement will be difficult to fulfil and that the action plan fails to address the structural conditions that put a premium on academic languages other than Norwegian.⁵¹

In its white paper *Sikker kunnskap i en usikker verden* published in March 2023, the Government considers whether compulsory language requirements may counter the internationalisation the country is deemed to need.⁵² Norway has a relatively low percentage of international students and doctoral students and many of those who are recruited choose to return to their homeland after completing their programme or their employment is terminated. According to the white paper, compulsory language requirements risk making internationalisation even more difficult.⁵³

Despite these fears, the Universities and University Colleges Act was amended with stricter requirements and from July 2025 knowledge of Norwegian equivalent to level B2 is required for all new academic appointments. Sections 3-18 and 3-19 of the Regulations accompanying

⁴⁹ Ministry of Education and Research, 2023, pp. 12–14.

⁵⁰ Ministry of Education and Research, 2023, pp. 11–13.

⁵¹ *Universitetsläraren*, 27.04.2024

⁵² Ministry of Education and Research, 2024/25, pp. 86–88.

⁵³ See above.

the Act also require HEIs to offer postdoctoral fellows and doctoral students who on appointment do not speak Norwegian, Swedish or Danish with training in Norwegian up to at least level A2.⁵⁴

University of Oslo

One university with the stated ambition of balancing national language policy with increasing internationalisation is the University of Oslo. The university revised its language policy in 2025 to reflect amendments to legislation.⁵⁵ The policy contains a number of general principles, including that the university must contribute to preserving Norwegian as an academic language and that the primary language at the university is Norwegian, but that everyone has the right to use Swedish or Danish. English is established as the primary non-Scandinavian language and the university must facilitate the parallel use of the Norwegian and English languages. It also states that language policy must be used in a way that helps strengthen the study and work environment for everyone, something that involves integrating students and staff, and promoting inclusion, diversity and participation.

Norwegian University of Science and Technology

Language policy at the Norwegian University of Science and Technology (NTNU) also promotes parallel language use as strategically important, stating that “NTNU must practise parallel language use. In practice, this means ‘Norwegian when you can, English when you must’”.⁵⁶ The policy also states that “Norwegian is the primary working language in the university administration,” although this comes with the proviso that administrative staff “must be proficient in both Norwegian (Bokmål and Nynorsk) and English”.

The policy also reiterates the statutory requirement for languages skills, stating that “permanent employees who do not master a Scandinavian language when they are appointed are responsible for learning Norwegian at B2 level”. Meanwhile, the policy states that NTNU “must also offer support to improve proficiency in English”.

Language in quality assurance processes

The project group has studied a sample of the reviews conducted by the Norwegian Agency for Quality Assurance in Education (NOKUT). These reveal that language issues are not afforded particular significance within the framework of Norwegian assessment processes. The reviewed expert opinions do not problematise language-related aspects. Nor does

⁵⁴ Regulations for Universities and University Colleges, FOR-2024-06-28-1392, Chapter 3. Teaching and research positions, recruitment positions and entry-level positions.

⁵⁵ University of Oslo Language Policy.

⁵⁶ Guidelines on Language Policy for NTNU, Chapter 1 clause 7.

the issue of the opportunities for international groups to influence quality assurance processes appear to have been identified as a problem during reviews of Norwegian HEIs, in contrast to Sweden.⁵⁷

Finland

The present Finnish Language Act (423/2003) entered into effect in 2004. The Act regulates language use at national and municipal level and establishes that the national languages of Finland are Finnish and Swedish, that acts and other statutes are to be adopted and published in both Finnish and Swedish, and that the individual has the right to use their own language, Finnish or Swedish, in contacts with the authorities. The Act does not contain provisions on language use in higher education, which are instead contained in the Universities Act (558/2009).

Section 11 of the Universities Act establishes the languages of instruction and degrees, Finnish and/or Swedish, to be used at each of the country's HEIs. It also states that universities may decide to use a language other than Finnish or Swedish as a language of instruction and degrees.⁵⁸ Section 35 of the Act states that the language of administration in universities is Finnish, except for Åbo Akademi University, Hanken School of Economics and the Swedish School of Social Science of the University of Helsinki, where the administrative language is Swedish. The Act also establishes that provisions on the proficiency of teaching and research staff and other staff in Finnish and Swedish are issued by government decree. Section 35 also grants all citizens the right to use either Finnish or Swedish in matters concerning them and to obtain official documents in the language they use.⁵⁹

The possibility afforded to HEIs to decide to use a language other than Finnish or Swedish in instruction and degrees has been widely applied and programmes are increasingly offered in English. According to the Finnish National Agency for Education, some 600 Bachelor's and Master's programmes are currently offered in English in Finland.⁶⁰

A new study warns that the two national languages Finnish and Swedish are in danger of being replaced as the academic language at Finnish HEIs by English. According to the study, 90 per cent of doctoral theses and 40 per cent Master's dissertations were written in English in 2023.⁶¹

Language use at Finnish HEIs has been legally tried in relation to the Universities Act on one occasion. In 2023, students at Aalto University –

⁵⁷ This impression was confirmed in correspondence with staff at NOKUT.

⁵⁸ Statute Book of Finland, Universities Act.

⁵⁹ Statute Book of Finland, Universities Act.

⁶⁰ What degree programmes are available in English? The Finnish National Agency for Education (EDUFI), 01.10.2025.

⁶¹ Institute for the Languages of Finland, 2023.

Finland's most English-speaking HEI, which only offers English-language Master's programmes – complained to the Chancellor of Justice that, in practice, English has usurped the place of Finnish as the language of instruction. The Deputy Chancellor of Justice urged the university to comply with the Universities Act. In his decision, he wrote that “English may not be used in university teaching to such an extent that the Finnish language's position as the language of instruction and degrees is marginalised”.⁶²

University of Helsinki

The Language Policy of Helsinki University is available in Finnish, Swedish and English. It begins by underlining that “bi- or multilingualism and internationalism are an asset for everyone”.⁶³ It also states that “the University of Helsinki bears a particular responsibility for Finland's national culture as well as for the position of the national languages (Finnish and Swedish) as languages of science”. The policy highlights the university's responsibility for internationalisation by emphasising that the university operates in an international environment, and the University must be attractive to international students, teachers and researchers.

The policy prescribes a situational, pragmatic approach to the HEI's internal work and assigns responsibility to the relevant units. At these units, as in other work situations, agreement should be reached generally and on each occasion that, where possible, Finnish, Swedish and English may be used in parallel. The university's language policy and its unit-specific application are also to be discussed within units in the appropriate forums and situations.

University Services prepares instructions for language use in official contexts and at decision-making meetings, as well as publishing examples of good practice to assist units in communicating in multiple languages.

Arcada University of Applied Sciences

Arcada University of Applied Sciences is a Swedish-language university in Helsinki. The university has established a language policy to regulate language use within the organisation. The policy is intended to promote the use and learning of Swedish among both students and staff. It also establishes that everyone in the university's organisation must have equal opportunities for participation, irrespective of their language background.

⁶² Office of the Chancellor of Justice, 14.12.2024

⁶³ Language Policy of the University of Helsinki, 25.09.2014.

The policy is characterised by a flexible and pragmatic approach to language use in which the choice of language is adapted to context and needs. It acknowledges that language use is situational, implying that an assessment of the most appropriate language must be made on a case-by-case basis.

Swedish is the main language of the university and is the language of administration in accordance with statutory requirements. In practice, English is used as a complementary working language, as this is the lingua franca used by students and staff with varying language backgrounds. Finnish is used when deemed appropriate and relevant to the activity.⁶⁴

Language in quality assurance processes

The project group has studied a sample of the audits conducted by the Finnish Education Evaluation Centre (FINEEC).⁶⁵ In one opinion the assessment panel writes that more could be done to integrate international students and ensure equal opportunities for all students. The assessors state that interviews revealed that it is difficult to involve international students in decision-making as they often lack contact with Finnish students. The assessment panel recommends that the HEI expand its continuing professional development for staff to include international students, and that it should be offered in English.

According to FINEEC, while the consequences of language use for the participation of international students, doctoral students and staff pose a problem that is highlighted in audits, no HEI has been placed under review and subsequently followed up in relation to issues with language use or participation, something that is explained by the formulation of assessment criteria. FINEEC reports that Finnish staff are more likely to teach first-cycle courses and internationally recruited staff and staff with a foreign background second-cycle courses. Finnish-speaking staff also bear a larger administrative burden, which in turn creates other inequalities.⁶⁶

Denmark

Denmark has no language act defining the status of the Danish language or regulating language use in society.⁶⁷ Nor does the Danish University Act contain any provisions stipulating the language of instruction or

⁶⁴ Arcada University of Applied Sciences Language Policy, 29.08.2022

⁶⁵ Finnish Education Evaluation Centre, 10.06.2025.

⁶⁶ Email correspondence with the Finnish Education Evaluation Centre, 23.04.2025.

⁶⁷ In spring 2025, the Conservative People's Party presented a bill to the Danish Parliament proposing the introduction of a language act. The bill was intended to promote the use of Danish in public administration, education and the media, and to reduce the use of English loan words.

research. However, the University Act does state that programmes must maintain a high international standard.⁶⁸

Even if language use in higher education is not regulated by law in Denmark, the State does intervene to develop the Danish language and the language skills of students and researchers in both Danish and English.⁶⁹

University of Copenhagen

The Language Policy for the University of Copenhagen describes the university as an internationally oriented university anchored in a Danish culture.⁷⁰ The policy emphasises the need for a language policy that promotes a parallel-language work and study environment with fewer language barriers for both staff and students and which supports the university's core activities. The policy also states that international staff must be encouraged to learn Danish to improve their career opportunities in Denmark and enhance their integration in the workplace and in Danish society.

Among the principles of the policy are that employees are expected to have an adequate command of English to perform their jobs and generally participate in the workplace, and that the university has a responsibility to offer English-language courses where necessary. Similarly, international research and teaching staff are generally expected to acquire adequate Danish-language skills to be able to teach, grade and supervise students in Danish within three to six years of their appointment. The policy instructs the relevant manager to clearly communicate this expectation during recruitment and during the first years of employment, and to ensure that support – including courses in Danish – is offered during working hours. These principles apply both to those employed for an indefinite period and those with fixed-term employment, and to doctoral students.

In 2008, the university adopted a policy of parallel language use, with English and Danish being given equal weight as languages of instruction and research.⁷¹ To address the challenges this involves, the University of Copenhagen established the Centre for Internationalisation and Parallel

⁶⁸ Section 2 of Part 1 states: The university is to conduct research and offer research-based education at the highest international level within its academic fields. The university must ensure equal interaction between research and education, perform ongoing strategic selection, prioritisation and development of its academic research and educational fields and disseminate knowledge of the methods and results of science.

⁶⁹ The Danish Language Council was established in 1955, with the aim of strengthening the position of the Danish language. The Danish Language Council is tasked with monitoring the development of the language by conducting research into the current and historical use of Danish through phenomena such as grammar, vocabulary and language technology. The Danish Language Council reports to the Ministry of Culture.

⁷⁰ University of Copenhagen, 26.10.2021.

⁷¹ The decision was made by university's Board in order to support the parallel language use strategy and to ensure a balance between English and Danish as languages of instruction, research and communication (email response from the university).

Language Use (CIP). CIP is a research centre that also offers language skills development courses to ensure that all students and staff have the opportunity to develop competence in English and Danish.⁷²

Aarhus University

Aarhus University's Language Policy includes the stated ambition to be a leading international university.⁷³ This means increasing the number of international students and researchers. The aim is to be an inclusive university that works for everyone regardless of language.

The key principle is that Danish is the primary language at Aarhus University, while English is the secondary language. The university is managed and administered in Danish, but communication concerning the rights and obligations of staff and students must be available in both Danish and English. It must be possible for non-Danish-speaking students and staff to communicate with the administration in English.

Language in quality assurance processes

The project group has studied a sample of opinions from the Danish Accreditation Institution.⁷⁴ This revealed that language issues do not appear to be afforded particular significance within the framework of Danish assessment processes.⁷⁵ The reviewed opinions do not problematise any aspects of language use, nor do they identify issues related to opportunities for international groups to influence quality assurance processes as a problem area during the accreditation of Danish HEIs.

France

Passed in 1994, The French Education Code⁷⁶ is intended to protect the French language and its development. Article 1 of the code states that French must be used in education, the workplace, commerce and public services. Article 11 states that the language of instruction, examination, dissertations and theses at all state and private HEIs is French unless otherwise justified by the need to teach regional or foreign languages and cultures, or when instruction is provided in foreign languages by associate teachers or visiting professors.

The fundamental objectives of the Education Code include mastery of the French language and knowledge of two other languages.⁷⁷ Exceptions can be made for foreign schools or schools especially set up

⁷² University of Copenhagen Centre for Internationalisation and Parallel Language Use, 10.06.2025.

⁷³ Aarhus University Language Policy, 10.06.2025.

⁷⁴ The Danish Accreditation Institution was closed on 1 July 2025.

⁷⁵ Danish Accreditation Institution.

⁷⁶ Code de l'éducation, Légifrance, 19.06.2025.

⁷⁷ Article L121-3.

to receive foreign pupils, or for institutions providing instruction of an international nature. Foreign students in programmes taught in English must also take courses in French, unless they already have a certain level of mastery of the French language.

A new law that entered into effect in 2013 permits English-medium instruction in HEIs under certain conditions.⁷⁸ This was intended to make French higher education more attractive to foreign students.⁷⁹

Introduced in 2018, the *Bienvenue en France* (Welcome to France) label is intended to make France a more attractive destination for foreign students. The label, which is administered by government agency Campus France, is an official stamp of quality for French HEIs that meet a number of defined criteria for their reception arrangements and support for international students.

The purpose of the label is to ensure that HEIs offer a study environment that promotes both integration and good results in terms of credits awarded. The label is closely associated with language management and choice of language, including a requirement for a significant part of the HEI's website to be available in English, particularly information concerning student life and programmes.

HEIs must also offer French-language courses targeted at international students, as well as set aside staff resources to ensure that international students can obtain support within a reasonable period of time.⁸⁰

University of Poitiers

The University of Poitiers's Language Policy underlines the importance of language learning at the university. Students and staff alike are encouraged to take language courses. The university encourages multilingualism and offers courses and opportunities for mobility. The university has introduced a sponsorship system with all international students being offered a French student sponsor who can provide day-to-day support.⁸¹

Sorbonne University

Sorbonne University's Language Policy is published on its official website. The policy states that, as the majority of programmes and courses are in French, it is important that students ensure that they meet the established language requirements before registering. The university

⁷⁸ Law no. 2013-660 of 22 July 2013, known as the Fioraso Law after the then Minister of Higher Education and Research, which reformed parts of the Education Code.

⁷⁹ Centre Inffo, 2023.

⁸⁰ Campus France.

⁸¹ University of Poitiers

strongly recommends that students improve their knowledge of French before beginning their studies.

The university also offers French-language courses that are open to both international students and foreign staff members. These courses are free of charge to first- and second-cycle students.⁸²

Language in quality assurance processes

None of the aforementioned language policies at French HEIs contain specific guidelines concerning the language of internal meetings or quality assurance processes. In correspondence with the High Council for the Evaluation of Research and Higher Education (Hcéres), the independent public authority responsible for evaluating higher education and research institutions in France, it was stated that there were no language barriers to quality assurance as those involved in the processes have a good command of French, which is the language used in this work. Hcéres also stated that the reception of international students is covered by essential assessment criteria within the framework of the authority's evaluations. Despite this, it does not appear that HEIs' internationalisation work affects the outcome of evaluations to any great extent. According to Hcéres, it has been noted that HEIs' internationalisation efforts are generally more successful in the second cycle than in the first.⁸³ The project group did not study a sample of opinions from Hcéres' evaluations.

⁸² Sorbonne University, 29.06.2020.

⁸³ Email correspondence with the High Council for the Evaluation of Research and Higher Education (Hcéres), 02.09.2025.

Conclusions

Pursuant to the Swedish Higher Education Act, the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the assessment criteria used by UKÄ in its various reviews and evaluations, quality assurance processes at HEIs must include and engage both students and staff. Participation also applies to international students and staff who, thanks to internationalisation, now constitute a relatively large percentage of the population of Sweden's HEIs.

Many HEIs have established language policies or language choice documents that support the practical management of language issues, including those related to quality assurance. The existence of these documents notwithstanding, our survey of expert opinions from reviews and evaluations conducted during the period 2017–2022 reveals that many universities and university colleges find involving international groups a challenge. That said, many of the opinions contain what they consider to be good examples of how to manage language choice and, in some cases, assessment panels also make recommendations and proposals for changes. None of these have required following up.

The survey shows that information does not always reach international students and doctoral students in a language they command, as there are no translations. This, combined with the general practice of holding administrative meetings in Swedish, threatens to make it more difficult for them to participate in quality assurance processes. This risk also applies to international academic staff. One potential negative consequence of this lack of representation is that the opinions of these groups will not be taken into account during quality assurance processes and the development of courses and programmes. The survey also reveals that the level of Swedish-language – and in some cases, English-language – support offered by HEIs varies, and that access to language sometimes determines the teaching opportunities afforded to doctoral students, something that can create inequalities in education and career opportunities. Assessment panels generally take a positive view of the broader use of English as a means to include students, doctoral students and staff who are not fluent in Swedish, and in several cases offer proposals on how to manage different languages, such as more translation, clearer language support, greater use of English in the HEI's administrative organisation, or holding pre-meetings in English. However, as noted above, it is debatable whether some of the views expressed by assessment panels are consistent with the Language Act.

Based on its analysis, UKÄ makes the following observations:

- While opinions concerning the participation of international groups are expressed, the comments do not address a specific assessment criterion in any of UKÄ's reviews and evaluations. Nor does the existing quality assurance system include assessment criteria that directly address language use. There is thus a risk that the participation of international students, doctoral students and staff in quality assurance processes has not been fully captured by UKÄ's reviews and evaluations, and that this dimension has therefore been unevenly reviewed. As such, there may be cause to address issues related to language choice in the assessor training provided by UKÄ prior to reviews.
- The Nordic countries have a longstanding ambition to adopt a common language policy that both encompasses the right to use the Nordic languages in the various countries and that promotes multilingualism and parallel language use to a greater extent. Despite this, there are discrepancies in terms of language choice and management within higher education and research. While Finland and Norway both have higher education and language acts that regulate HEIs, Denmark has more decentralised and voluntary regulation.

One difference relates to the specific consideration given to the operations of HEIs in legislation. Norway and Finland have higher education acts that regulate the language of administration in universities and university colleges. Norway's language act is more far-reaching than the other countries in that it also covers academic language.

Another difference is the expectations placed on staff, students and doctoral students recruited from abroad in each country, and the language support offered to help them meet these expectations. Norway formulates its expectations at national level and has instituted requirements for basic knowledge of Norwegian when making appointments at Norwegian HEIs. In Denmark, where local regulations apply, an HEI such as the University of Copenhagen can require international staff to acquire the Danish language within three to six years of appointment, so that they can participate fully in the HEI's activities. Meanwhile, French universities offer French-language courses that are open to both international students and foreign staff members, and the country has recently introduced an internationalisation label for French HEIs, for which such measures are criteria for certification.

There are also similarities. At Finnish and Danish HEIs, English is increasingly the language of instruction and research. Even in

France, where teaching in English was once highly restricted, opportunities are opening up to do so.

The extent to which internationally recruited staff and students are able to participate in quality assurance processes does not seem to be such a prominent issue in the other countries as it is in Sweden.

- As noted in studies and reports from relevant agencies, the Swedish Language Act is a framework law for public authorities that takes no account of the specific assignments and operations of HEIs. There are obvious signs that it may conflict with the Higher Education Act with regard to its practical application at universities and university colleges. The Parliamentary Ombudsmen have addressed such conflicts and pointed out contradictions on several occasions in an attempt to clarify the situation. A number of bodies consulted prior to the implementation of the Language Act underlined the necessity of considering the specific conditions prevailing in higher education and research. The present report illustrates some of the practical problems created by these conflicting goals and demonstrates that they threaten both the efforts of HEIs to involve international students, doctoral students and staff and their career development.

It is clear that the English language is continuing to expand into research and education at Swedish HEIs, hence the need to follow up the extent to which the Language Act supports HEIs' specific responsibility as government agencies to ensure that, in research and education, "Swedish terminology in their various areas of expertise is accessible, and that it is used and developed", a point emphasised in the legislative history of the Act as an important motivation for its introduction.

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Appendix

Overview of standards, guidelines and assessment criteria

European Standards and Guidelines

Relevant European Standards and Guidelines include:

Programmes are designed by involving students and other stakeholders in the work (Guideline to Standard 1.2); The needs of a diverse student population (such as mature, part-time, employed and international students as well as students with disabilities) [...] are taken into account when allocating, planning and providing the learning resources and student support (Guideline to Standard 1.6); Programmes are reviewed and revised regularly involving students and other stakeholders (Guideline to Standard 1.9).

UKÄ's quality assurance system

The following assessment criteria are examples of how students and staff were to be involved in quality assurance processes during institutional reviews and third-cycle programme evaluations during the period 2017–2022.

Institutional review:

Assessment criterion 1. Established order and quality culture

The HEI has an established and generally available description of its quality assurance system, stating the division of responsibility, principles and specific working methods for assuring and enhancing the quality of education. Quality assurance processes involve management, staff and students, as well as external stakeholders when appropriate, and underpin a culture of quality and the strategic work at all levels of the organisation.

Assessment criterion 2. Continuous monitoring

The HEI ensures that it follows up and continuously collects, analyses and utilises appropriate data with a bearing on the quality and relevance of courses and study programmes. This data is available to relevant stakeholders and is used as a basis for developing courses and programmes, strategic decisions and prioritisations.

Assessment criterion 5. Student support, learning resources and infrastructure

The HEI works systematically to ensure that infrastructure, student support and learning resources are fit for the purpose of students' and doctoral students' learning.

Assessment criterion 8. Student-centred learning

The HEI works systematically to ensure that it applies the principle of student-centred learning.

Evaluations of third-cycle programmes

Assessment criterion, third-cycle study environment

The research/artistic research conducted at the HEI is of adequate quality and scope for third-cycle programmes to be conducted to a high level of scientific/artistic quality and with good educational conditions generally. Relevant collaboration takes place with the surrounding community both nationally and internationally.

Assessment criterion, student perspective

Doctoral students are given the opportunity to play an active role in developing the content and implementation of the programme.

The programme ensures that the doctoral student enjoys a good physical and psychosocial work environment.

Assessment criterion, working life and collaboration

The programme is designed and implemented in a manner that ensures that it is useful and develops the doctoral student's preparedness for dealing with changes in working life both within and outside academia.

Assessment criteria, follow-up, measures and feedback

The content, implementation and assessment of the programme is followed up systematically. When necessary, the results of follow-ups are translated into quality enhancement measures and feedback to stakeholders.

The HEI make efforts to ensure that doctoral students complete their studies within the planned programme length.

The Swedish Higher Education Authority (UKÄ) is tasked with strengthening higher education in Sweden and assuring Sweden's status as a knowledge society. We review the quality of higher education, analyse and follow up developments in the higher education sector and monitor legal certainty for students.

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